REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks.

Claims 1-56 are pending in the application, with claims 1, 14, 24, 34, 42 and 51 being independent. Claims 6, 8, 10-13, 17, 19, 21-23, 27, 29, 31-33, 37, 39, 41, 43-49, 55 and 56 were previously withdrawn. Claims 1, 12, 14-24, 32, 34, 42, 43, 45, 46 and 51 are currently amended. Support for the claim amendments and additions can be found in the original disclosure. No new matter has been added.

§ 101 REJECTIONS

Claims 14-16, 18, and 20 stand rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. This rejection is respectfully traversed. Nevertheless, Applicant has amended claims 14-23 to recite "computer-readable storage medium," and respectfully requests withdrawal of the 35 U.S.C. § 101 rejections.

§ 103 REJECTIONS

Claims 1-5, 7, 9, 14-16, 18, 20, 24-26, 28, 30, 34-36, 38, 40, 42, 50-52, and 54 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,904,185 (Wilkins) in view of U.S. Patent Application Publication 2003/0210335 (Carau).

Claim 53 stands rejected under 35 U.S.C. § 103(a) as being obvious over Wilkins in view of Carau and further in view of U.S. Patent Application Publication 2003/0059202 (Yoda).

Applicant respectfully traverses the rejections. Nevertheless, without conceding the propriety of the rejection and in the interest of expediting allowance of the application, independent claims 1, 14, 24, 34, 42 and 51 have been amended as proposed during the interview and are believed to be allowable.

Wilkins in view of Carau

Claims 1-5, 7, 9, 14-16, 18, 20, 24-26, 28, 30, 34-36, 38, 40, 42, 50-52, and 54 stand rejected under 35 U.S.C. § 103(a) as being obvious over Wilkins in view of Carau. Applicant respectfully traverses the rejection.

Without conceding the propriety of the rejection and in the interest of expediting allowance of the application, independent claim 1 is amended for clarification. Support for the amendment is found in at least paragraph [0021], lines 9-11 and Fig. 6 of the application as originally filed.

Independent claim 1, as presently presented recites (emphasis added):

> 1. (Currently Amended) A method for use on a computing device, the method comprising:
>> creating a digital negative from digital object;
>> linking the digital object to the digital negative;
>> responsive to a save operation associated with the
> digital object:
>> generating a new digital object; and
>> bi-directionally linking the digital negative to the new
> digital object, ***wherein the digital negative is directly linked to the digital object on which it is based and directly linked to any versions, copies, and/or versioned copies of the digital object***; and
>> responsive to a revert operation associated with the
> new digital object, replacing content of the new digital object
> with content of the digital negative.

Applicant asserts that Wilkins and Carau do not teach or suggest the amended features of this claim, including, *"wherein the digital negative is directly linked to the digital object on which it is based and directly linked to any versions, copies, and/or versioned copies of the digital object."*

Wilkins is directed to:

> The original digital negative of the multimedia asset is modified to form a first resultant multimedia asset based upon which a first edit list is generated. The first edit list, in turn, is associated with the first resultant multimedia asset and linked to the original digital negative of the multimedia asset. The first multimedia asset is then modified to form a second resultant multimedia asset based upon which a second edit list is generated. The second edit list is associated with the second resultant multimedia asset and linked to the first resultant multimedia asset. (Abstract).

However, associating the second multimedia asset's edit list with the first multimedia asset, fails to disclose Applicant's claimed operation of *"wherein the digital negative is directly linked to the digital object on which it is based and directly linked to any versions, copies, and/or versioned copies of the digital object."* (emphasis added) as discussed during the interview. In other words, Wilkins does not directly link all subsequent multimedia assets *directly* with the digital negative. Therefore, Applicant respectfully asserts that the evidence in the Wilkins reference does not teach or suggest the subject matter of amended claim 1.

Applicant also respectfully submits that the Carau references does not teach or suggest the features of amended claim 1. Carau was cited for its alleged teaching of, "creating a digital negative," and, "responsive to an undo or revert operation, reversing the edits and restoring the original capture image, or digital negative." Even if for the

sake of argument, that Carau discloses such features, Carau still fails to remedy the deficiencies in Wilkins noted above. For example, Carau fails to teach or suggest, *"wherein the digital negative is directly linked to the digital object on which it is based and directly linked to any versions, copies, and/or versioned copies of the digital object,"* as presently recited. (emphasis added).

Thus, Wilkins and Carau, whether taken alone or in combination (assuming for the sake of argument that they can be combined), fail to teach or suggest the features of this claim. Accordingly, as discussed during the interview, claim 1 is allowable.

Dependent claims 2-5, 7, and 9 depend from independent claim 1 and are allowable by virtue of this dependency, as well as for additional features that they recite. Applicant respectfully requests the § 103 rejection of these claims be withdrawn.

Independent claim 14, as presently presented recites (emphasis added):

> 14. (Currently Amended) A computer-readable storage medium comprising computer-executable instructions for:
> creating a digital negative from a digital image;
> linking the digital image to the digital negative;
> responsive to a save operation associated with the digital image:
> generating a new digital image; and
> bi-directionally linking the digital negative to the new digital image, *wherein the digital negative is directly linked to the digital image on which it is based and directly linked to any versions, copies, and/or versioned copies of the digital image*; and
> responsive to a revert operation associated with the new digital image, replacing pixel content of the new digital image with pixel content of the digital negative.

In making out a rejection of claim 14 before its amendment, the Office states that this claim is obvious over Wilkins in view of Carau. Applicant respectfully traverses the rejection. Nevertheless, for the sole purpose of expediting allowance and without

conceding the propriety of the Office's rejections, Applicant has amended claim 14 as discussed during the above-referenced interview. Applicant asserts that the evidence in the Wilkins reference fails to teach or suggest the features of amended independent claim 14, at least for reasons similar to those discussed above with regards to claim 1. Additionally, Applicant also asserts that Carau fails to remedy the deficiencies in Wilkins noted above, at least for reasons similar to those discussed above with regards to claim 1.

During the above-referenced interview, Applicant understood the Office to agree. Applicant sincerely thanks the Office for this indication and, for at least this reason, submits that this claim stands allowable.

Dependent claims 15-16, 18, and 20 depend from independent claim 14 and are allowable by virtue of this dependency, as well as for additional features that they recite. Applicant respectfully requests the §103 rejection of these claims be withdrawn.

Independent claim 24, as presently presented recites (emphasis added):

> 24. (Currently Amended) A computing device comprising:
> a processor; and
> a memory coupled to the processor, the memory comprising computer-readable medium comprising computer-program instructions executable by the processor for:
> creating a digital negative from a digital image;
> linking the digital image to the digital negative;
> responsive to a save operation associated with the digital image:
> generating a new digital image; and
> bi-directionally linking the digital negative to the new digital image, *wherein the digital negative is directly linked to the digital image on which it is based and directly linked to any versions, copies, and/or versioned copies of the digital image*; and
> responsive to a revert operation associated with the new digital image, replacing pixel content of the new digital image with pixel content of the digital negative.

In making out a rejection of claim 24 before its amendment, the Office states that this claim is obvious over Wilkins in view of Carau. Applicant respectfully traverses the rejection. Nevertheless, for the sole purpose of expediting allowance and without conceding the propriety of the Office's rejections, Applicant has amended claim 24 as discussed during the above-referenced interview. Applicant asserts that the evidence in the Wilkins reference fails to teach or suggest the features of amended independent claim 24, at least for reasons similar to those discussed above with regards to claim 1. Additionally, Applicant also asserts that Carau fails to remedy the deficiencies in Wilkins noted above, at least for reasons similar to those discussed above with regards to claim 1.

During the above-referenced interview, Applicant understood the Office to agree. Applicant sincerely thanks the Office for this indication and, for at least this reason, submits that this claim stands allowable.

Dependent claims 25-26, 28, and 30 depend from independent claim 24 and are allowable by virtue of this dependency, as well as for additional features that they recite. Applicant respectfully requests the §103 rejection of these claims be withdrawn.

Independent claim 34, as presently presented recites (emphasis added):

> 34. (Currently Amended) A computing device comprising:
>   means for creating a digital negative from a digital image;
>   means for linking the digital image to the digital negative;
>   responsive to a save operation associated with the digital image:
>   means for generating a new digital image; and
>   means for bi-directionally linking the digital negative to the new digital image, ***wherein the digital negative is directly linked to the digital image on which it is based and directly linked to any versions, copies, and/or versioned copies of the digital image***; and

responsive to a revert operation associated with the new digital image, means for replacing pixel content of the new digital image with pixel content of the digital negative.

In making out a rejection of claim 34 before its amendment, the Office states that this claim is obvious over Wilkins in view of Carau. Applicant respectfully traverses the rejection. Nevertheless, for the sole purpose of expediting allowance and without conceding the propriety of the Office's rejections, Applicant has amended claim 34 as discussed during the above-referenced interview. Applicant asserts that the evidence in the Wilkins reference fails to teach or suggest the features of amended independent claim 34, at least for reasons similar to those discussed above with regards to claim 1. Additionally, Applicant also asserts that Carau fails to remedy the deficiencies in Wilkins noted above, at least for reasons similar to those discussed above with regards to claim 1.

During the above-referenced interview, Applicant understood the Office to agree. Applicant sincerely thanks the Office for this indication and, for at least this reason, submits that this claim stands allowable.

Dependent claims 35-36, 38 and 40 depend from independent claim 34 and are allowable by virtue of this dependency, as well as for additional features that they recite. Applicant respectfully requests the §103 rejection of these claims be withdrawn.

Independent claim 42, as presently presented recites (emphasis added):

> 42.   (Currently Amended) A method for presenting a user interface, the method comprising:
>   presenting an interface for a user to create and manage digital negatives across single or multiple linear picture version history progressions; and
>   receiving, via the interface, an indication of an implicit save operation with respect to a digital image;
>   responsive to the indication, evaluating whether the digital image has a corresponding digital negative; and

responsive to determining that the digital image does not have a corresponding digital negative:

generating a digital negative for the digital image such that the digital negative comprises substantially same pixel content as the digital image; and

linking the digital image to the digital negative, ***wherein the digital negative is directly linked to the digital image on which it is based and directly linked to any versions, copies, and/or versioned copies of the digital image***.

In making out a rejection of claim 42 before its amendment, the Office states that this claim is obvious over Wilkins in view of Carau. Applicant respectfully traverses the rejection. Nevertheless, for the sole purpose of expediting allowance and without conceding the propriety of the Office's rejections, Applicant has amended claim 42 as discussed during the above-referenced interview. Applicant asserts that the evidence in the Wilkins reference fails to teach or suggest the features of amended independent claim 42, at least for reasons similar to those discussed above with regards to claim 1. Additionally, Applicant also asserts that Carau fails to remedy the deficiencies in Wilkins noted above, at least for reasons similar to those discussed above with regards to claim 1.

During the above-referenced interview, Applicant understood the Office to agree. Applicant sincerely thanks the Office for this indication and, for at least this reason, submits that this claim stands allowable.

Dependent claim 50 depends from independent claim 42 and is allowable by virtue of this dependency, as well as for additional features that they recite. Applicant respectfully requests the §103 rejection of this claim be withdrawn.

Independent claim 51, as presently presented recites (emphasis added):

51.   (Currently Amended) A method for interfacing with a digital negative management application, the method comprising:

issuing a request to create a digital negative for a specified digital image, the request causing:

the digital negative to be linked to the digital image, *wherein the digital negative is directly linked to the digital image on which it is based and directly linked to any versions, copies, and/or versioned copies of the digital image*; and

the digital negative to be generated to comprise pixel content of the digital image at the time of the request to create; and

communicating a request to revert pixel contents of a version of the digital image to the pixel content of the digital negative.

In making out a rejection of this claim 51 before its amendment, the Office states that this claim is obvious over Wilkins in view of Carau. Applicant respectfully traverses the rejection. Nevertheless, for the sole purpose of expediting allowance and without conceding the propriety of the Office's rejections, Applicant has amended claim 51 as discussed during the above-referenced interview. Applicant asserts that the evidence in the Wilkins reference fails to teach or suggest the features of amended independent claim 51, at least for reasons similar to those discussed above with regards to claim 1. Additionally, Applicant also asserts that Carau fails to remedy the deficiencies in Wilkins noted above, at least for reasons similar to those discussed above with regards to claim 1.

During the above-referenced interview, Applicant understood the Office to agree. Applicant sincerely thanks the Office for this indication and, for at least this reason, submits that this claim stands allowable.

Dependent claims 52 and 54 depend from independent claim 51 and are allowable by virtue of this dependency, as well as for additional features that they recite. Applicant respectfully requests the §103 rejection of these claims be withdrawn.

Wilkins in view of Carau and further in view of Yoda

Claim 53 stands rejected under 35 U.S.C. § 103(a) as being obvious over Wilkins in view of Carau and further in view of Yoda. Applicant respectfully traverses the rejection. Dependent claim 53 depends from independent claim 51, and includes all features of that claim.

As discussed above, Wilkins in view of Carau fails to teach or suggest the features of independent claim 51.

Yoda was cited for its alleged teaching of, "deleting an image or set of images from storage." However, even if for the sake or argument that Yoda discloses such features, Yoda still fails to remedy the deficiencies in Wilkins and Carau noted above. For instance, Yoda fails to teach or suggest, "*wherein the digital negative is directly linked to the digital image on which it is based and directly linked to any versions, copies, and/or versioned copies of the digital image.*" (emphasis added).

Thus, Wilkins, Carau and Yoda, whether taken alone or in combination (assuming for the sake of argument that they can be combined), fail to teach or suggest the features of dependent claim 53. Accordingly, as discussed during the interview, claim 53 is allowable and Applicant respectfully requests the §103 rejection of this claim be withdrawn.

REJOINDER OF WITHDRAWN CLAIMS

Applicant submits that independent claims 1, 14, 24, 34, 42 and 51 are allowable. Accordingly, Applicant requests rejoinder of the withdrawn claims 6, 8, 10-13, 17, 19, 21-23, 27, 29, 31-33, 37, 39, 41, 43-49, 55 and 56. Specifically, since the independent

claims presented herein are allowable, Applicant is entitled to consideration of claims to additional species which depend from or otherwise require all the limitations of an allowable generic claim as provided by 37 CFR 1.141.

CONCLUSION

For at least the foregoing reasons, claims 1-56 are in condition for allowance. Applicant respectfully requests reconsideration and withdrawal of the rejections and an early notice of allowance.

If any issue remains unresolved that would prevent allowance of this case, **Applicant requests that the Examiner contact the undersigned attorney to resolve the issue**.

Respectfully submitted,

Date: __3/11/2008__

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